

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

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June 3, 2013

Kenneth Fleck, Manager of Geology & Environmental Affairs  
Energy West Mining Company  
P.O. Box 310  
Huntington, UT 84528

Subject: Update to Volume 10, Energy West Mining Company, Cottonwood/Wilberg Mine, C/015/0019, Task ID #4329

Dear Mr. Fleck:

The Division has reviewed your application to update Volume 10 of the Cottonwood/Wilberg Mining and Reclamation Plan. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The initials of the deficiencies authors are provided so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application by no later than July 8, 2013.

If you have any questions, please call me at (801) 538-5350.

Sincerely,



Daron R. Haddock  
Coal Program Manager

DRH/IC/ss  
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## **Deficiency List**

**Task No. 4329**

**Update to Volume 10**

Members of the review team with outstanding deficiencies:

Ingrid Campbell (IC) 801-538-5318

Priscilla Burton (PB) 435-613-3733

Ken Hoffman (KH) 801-538-5345

**R645-301-114:** Right of way documents, certificates of insurance, Proof of publication, grant of easement, and other pertinent documents currently located in chapter 1 of volume 10 must be retained in either the revised volume 10 or elsewhere in the Mining and Reclamation Plan. (IC)

**R645-301-121.200, 1)** For clarity, please include the date of initial construction and the status of the site at the present time. Please provide a map showing the reclaimed and active sections of this site.**2)** A cover sheet for Appendix A and Appendix B is requested and the Appendices should be included in the Table of Contents. (PB)

**R645-301-231.300,** Please include the interim monitoring and reporting described on page 3-11 of the approved plan. (PB)

**R645-301-234, 1)** Please include the salvage of topsoil along the roadway and its storage on the road embankment, see existing plan pages 3-3 and 3-4. **2)** Plates 4-4 shows the topsoil and subsoil stockpile locations and topography. No volume estimates are provided. Please provide volume estimates for soil stored in stockpiles. If contemporaneous reclamation has reduced the volumes significantly, please indicate the remaining volumes of topsoil and subsoil in stockpiles. **3)** Plate 4-5 points to the location of the soil stockpiles, but does not outline them. Soil stockpiles should be outlined on Plate 4-5. **4)** Section 301-526 Topsoil states that access road topsoil was temporarily stockpiled in locations along the road. What is the status of these soil stockpiles. Have they been treated with interim reclamation? They should also be shown on the map.**5)** Please delete the words "if found to be needed" from the interim fertilizer application which is item 3 of the interim revegetation methodology. (PB)

**R645-301-243,** Please include the interim soil monitoring described on page 3-11 of the approved plan. (PB)

**R645-301-220,** In Section R645-301-231.100, please refer to Map 7-2 topsoil stripping map, which provides historical information. (PB)

**R645-301-242, 1)** Please include the collection of topsoil from the 5 acre roadway outcrops and its redistribution in this discussion. **2)** Please state the reclamation of the entire site will require 39,000 yd3 of topsoil and 26,000 yd3 of subsoil as currently stated on page 4-3. (PB)

**R645-301-243**, Step 3 in the final reclamation plan (Section 341.200) states that fertilizer application will be determined by soil analysis. Interim monitoring of reclaimed soils are described on page 3-11 of the approved plan and monitoring of the waste for acid toxic characteristics is described on pages 2-12.1 and 2-12.2, please include soil sampling and analysis in Section 243 or Section 242 of the revision. (PB)

**R645-301-356**: Please include the woody species standard for success of 2500 stems per acre in the revision to chapter 10. (IC)

**R645-301-553.252, 1)** Sampling of the waste is described using the Division Overburden and Topsoil, Table 9, Jan 2003. The Division Overburden and Topsoil Handling Guideline was finalized in 2008. The Correct tables to cite for this sampling would be Tables 3 and 7.

**2)** Sampling of graded waste is described in the revision Section 536. The approved plan describes operational sampling on pages 2.12.1 and 2-12.2 for pH, texture, EC, SAR, Se, B and color of 2 grab samples/acre/lift and 1 sample per 200 linear ft. of berm, and final sampling of 2 grab samples/acre four feet below the final graded surface. The final sampling would include the above analyses and also selenium, CaCO<sub>3</sub>, pyritic sulfur, acid/base accounting and organic carbon. Page 2.13 states that all sampling would be reported in the Annual Report. Please include the sampling method and number of samples per acre and sampling locations as described in the revised MRP. (PB)

**R645-301-724.100** The Ground Water Information section should be updated to reflect that data has been collected at well WCWR for many years. While no changes to the facility are going to be made based on this correction the fact that the baseline data was collected should be reflected. (KH)

**R645-301-763.100** If it is the desire of the permittee to remove the siltation structure sooner than two years after the last augmented seeding then the permittee must add language to Section R645-301-763.100 justifying this action and demonstrating how suspended solids runoff will be controlled. (KH)